



UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOOGLE LLC,

*Plaintiff,*

v.

10260-DLC

Civil Action No. 1:21-cv-

DMITRY STAROVIKOV; ALEXANDER FILIPPOV;

Does 1–15,

*Defendants.*

**Plaintiff Google LLC (“Google”) has sued Defendants Dmitry Starovikov, Alexander Filippov, and Does 1-15 associated with the Internet domains listed in the pleading set forth below. Google alleges that Defendants have deployed the Glupteba malware to form a botnet—a network of internet-connected devices, each of which is infected by the Glupteba malware—to steal personal login information from Google customers; to facilitate the use of unfunded credit cards to purchase ads; to sell disruptive ads to display on infected devices; to sell access to infected devices to relay, or “proxy,” communications; and to hijack computing power of infected devices to generate cryptocurrency. Google alleges that, through these actions, the Defendants have violated federal and state law. Google sought and received a preliminary injunction enjoining the Defendants from these and other activities and directing the registrars associated with Defendants' Internet domains to take all steps necessary to disable access to and operation of Glupteba-affiliated domains. Google intends to seek a permanent injunction and other equitable relief. Full copies of the pleading documents, related filings, and orders from the Court are available below.**

**NOTICE TO DEFENDANT: READ THESE PAPERS CAREFULLY! You must “appear” in this case or the other side will win automatically. To “appear” you must file with the court a legal document called a “motion” or “answer.” The “motion” or “answer” must be given to the court clerk or administrator within 21 days of the date of first publication specified herein. It must be in proper form and have proof of service on Google's attorney, Laura Harris, King & Spalding LLP, 1185 Ave. of the Americas, 34th Floor, New York, NY 10036. If you have questions, you should consult with your own attorney immediately.**





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[Complaint](#)[A. Filippov Summons](#)[D. Starovikov Summons](#)[Summons for Does 1-15](#)

## DECLARATIONS AND EXHIBITS TO GOOGLE'S COMPLAINT

[E. Bisbee Declaration](#)[S. Huntley Declaration + Exhibits](#)[L. Harris Declaration + Exhibits](#)

## COURT ORDERS

[Order Granting TRO](#)[Order Granting Preliminary Injunction](#)[Order Vacating Entry of Default](#)[Order Granting Service on Doe Defendants](#)

## APPLICATION FOR EMERGENCY TRO AND PRELIMINARY INJUNCTION

[Motion for a Temporary Restraining Order](#)[Memorandum of Law for TRO and Order to Show Cause](#)[Proposed \*Ex Parte\* TRO and OSC re Preliminary Injunction](#)



[Certificate of Service](#)

[Proposed Certificate of Default](#)

[Google's Request for Entry of Default](#)

[Declaration of L. Harris ISO Entry of Default](#)

[Clerk's Certificate of Default](#)

[Defendants' Motion to Set Aside Entry of Default](#)

[A. Filippov Declaration ISO Motion to Set Aside Entry of Default](#)

[D. Starovikov Declaration ISO Motion to Set Aside Entry of Default](#)

[Google MOL in Opposition to Defendants' Motion to Vacate Entry of Default and In Support of Default Judgment and Permanent Injunction](#)

[Proposed Final Default Judgment and Order for Permanent Injunction](#)

[Declaration of L. Harris ISO Google's MOL in Opposition to Defendants' Motion to Vacate Entry of Default and Dismiss and in Support of Google's Motion for Default Judgment & Permanent Injunction](#)

